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Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

**CERTIFICATE OF NO OBJECTION TO APPLICATIONS FOR
INTERIM COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED
BY APPLICANTS FROM DECEMBER 1, 2022 THROUGH MARCH 31, 2023**

Irving H. Picard, as trustee (the “Trustee”) for the liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–lll and the substantively consolidated Chapter 7 estate of Bernard L. Madoff, by and through his

undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On June 28, 2023, the Trustee filed the Applications for Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred by Applicants from December 1, 2022 through March 31, 2023 (the “Fee Applications”). These Fee Applications include the following:

- A. Forty-Second Application of Trustee and Baker & Hostetler LLP for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from December 1, 2022 through March 31, 2023 for Baker & Hostetler, L.L.P., Trustee's Attorney, period: 12/1/2022 to 3/31/2023, fee: \$35,411,397.57, expenses: \$174,735.46 filed by Baker & Hostetler, L.L.P. (Filed: 6/28/2023) [ECF No. 23332]
- B. Application of Schiltz & Schiltz as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from December 1, 2022 through March 31, 2023 and for Release of a Portion of Fees Held Back for Schiltz & Schiltz, Special Counsel, period: 12/1/2022 to 3/31/2023, fee: \$38,785.87, expenses: \$2,521.08 filed by Schiltz & Schiltz (Filed: 6/28/2023) [ECF No. 23333]
- C. Application of Soroker Agmon Nordman as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from December 1, 2022 through March 31, 2023 and for Release of a Portion of Fees Held Back for Soroker Agmon Nordman, Special Counsel, period: 12/1/2022 to 3/31/2023, fee: \$245,595.57, expenses: \$0.00 filed by Soroker Agmon Nordman (Filed: 6/28/2023) [ECF No. 23334]
- D. Application of Graf & Pitkowitz Rechtsanwalte GmbH as Special Counsel to the Trustee for a Release of a Portion of Fees Previously Held for the Prior Compensation Periods for Graf & Pitkowitz Rechtsanwalte GmbH, Special Counsel, period: 12/1/2022 to 3/31/2023, fee: \$ 0.00, expenses: \$ 0.00 filed by Graf & Pitkowitz Rechtsanwalte GmbH (Filed: 6/28/2023) [ECF No. 23335]
- E. Forty-First Application of Windels Marx Lane & Mittendorf, LLP for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred From December 1, 2022 through March 31, 2023 and Request for Partial Release of Holdback for Windels Marx Lane & Mittendorf, LLP, Special Counsel, period: 12/1/2022 to 3/31/2023, fee: \$2,928,135.50, expenses: \$9,625.57 filed by Windels Marx Lane & Mittendorf, LLP (Filed: 6/28/2023) [ECF No. 23336]

- F. Application of Browne Jacobson, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from December 1, 2022 through March 31, 2023 and for Release of a Portion of Fees Held Back for Browne Jacobson, LLP, Special Counsel, period: 12/1/2022 to 3/31/2023, fee: \$132,696.05, expenses: \$176.42 filed by Browne Jacobson, LLP (Filed: 6/28/2023) [ECF No. 23337]
- G. Application of Addleshaw Goddard (Ireland) LLP as Special Counsel to the Trustee for a Release of a Portion of Fees Previously Held for the Prior Compensation Periods for Addleshaw Goddard (Ireland) LLP, Special Counsel, period: 12/1/2022 to 3/31/2023, fee: \$0.00, expenses: \$0.00 filed by Addleshaw Goddard (Ireland) LLP (Filed: 6/28/2023) [ECF No. 23338]
- H. Application of Velitor Law as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from December 1, 2022 through March 31, 2023 and for Release of a Portion of Fees Held Back for Velitor Law, Special Counsel, period: 12/1/2022 to 3/31/2023, fee: \$932.96, expenses: \$0.00 filed by Velitor Law (Filed: 6/28/2023) [ECF No. 23339]
- I. Application of UGGC & Associes as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from July 5, 2022 through March 31, 2023 and for Release of a Portion of Fees Held Back for UGGC & Associes, Special Counsel, period: 7/5/2022 to 3/31/2023, fee: \$59,626.34, expenses: \$0.00 filed by UGGC & Associes (Filed: 6/28/2023) [ECF No. 23340]
- J. Application of Monfrini Bitton Klein as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from December 1, 2022 through March 31, 2023 and for Release of a Portion of Fees Held Back for Monfrini Bitton Klein, Special Counsel, period: 12/1/2022 to 3/31/2023, fee: \$134,160.31, expenses: \$6,223.64 filed by Monfrini Bitton Klein (Filed: 6/28/2023) [ECF No. 23341]
- K. Thirty-Seventh Application of Young Conaway Stargatt & Taylor, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from December 1, 2022 through March 31, 2023 and for Release of a Portion of Fees Previously Held Back for Young Conaway Stargatt & Taylor, LLP, Special Counsel, period: 12/1/2022 to 3/31/2023, fee: \$238,806.98, expenses: \$3,853.47 filed by Young Conaway Stargatt & Taylor, LLP (Filed: 6/28/2023) [ECF No. 23342]

- L. Fifth Application of Bowman and Brooke LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from December 1, 2022 through March 31, 2023 and for Release of a Portion of Fees Held Back for Bowman and Brooke LLP, Special Counsel, period: 12/1/2022 to 3/31/2023, fee: \$15,305.50, expenses: \$0.20 filed by Bowman and Brooke LLP (Filed: 6/28/2023) [ECF No. 23343]
- M. Final Application of Lukins & Annis P.S. as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from August 1, 2022 through March 31, 2023 and for Release of Fees Held Back for Lukins & Annis P.S., Special Counsel, period: 8/1/2022 to 3/31/2023, fee: \$102.00, expenses: \$0.00 filed by Lukins & Annis P.S. (Filed: 6/28/2023) [ECF No. 23344]
- N. Application of Werder Vigano as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from December 1, 2022 through March 31, 2023 and for Release of a Portion of Fees Held Back for Werder Vigano, Special Counsel, period: 12/1/2022 to 3/31/2023, fee: \$2,086.28, expenses: \$0.00 filed by Werder Vigano (Filed: 6/28/2023) [ECF No. 23345]
- O. Application of Alfaro, Ferrer & Ramirez as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from February 13, 2023 through March 31, 2023 for Alfaro, Ferrer, Ramirez, Special Counsel, period: 2/13/2023 to 3/31/2023, fee: \$7,737.71, expenses: \$0.00 filed by Alfaro, Ferrer, Ramirez (Filed: 6/28/2023) [ECF No. 23346]
- P. Application of Alpeggiani Studio Legale Associato as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from December 1, 2022 through March 31, 2023 and for Release of a Portion of Fees Previously Held Back for Alpeggiani Studio Legale Associato, Special Counsel, period: 12/1/2022 to 3/31/2023, fee: \$5,464.07, expenses: \$16.65 filed by Alpeggiani Studio Legale Associato (Filed: 6/28/2023) [ECF No. 23347]
- Q. Second Application of Holland & Hart LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from December 1, 2022 through March 31, 2023 and for Release of a Portion of Fees Previously Held Back for Holland & Hart LLP, Special Counsel, period: 12/1/2022 to 3/31/2023, fee: \$18,522.00, expenses: \$4,706.27 filed by Holland & Hart LLP (Filed: 6/28/2023) [ECF No. 23348]
- R. Application of Kugler Kandestin, L.L.P. as Special Counsel to the Trustee for a Release of a Portion of Fees Previously Held for the Prior Compensation Periods for Kugler Kandestin, L.L.P., Special Counsel, period: 12/1/2022 to 3/31/2023, fee: \$0.00, expenses: \$0.00 filed by Kugler Kandestin, L.L.P. (Filed: 6/28/2023) [ECF No. 23349]

- S. Application of Tan Kok Quan Partnership as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from January 13, 2023 through March 31, 2023 for Tan Kok Quan Partnership, Special Counsel, period: 1/13/2023 to 3/31/2023, fee: \$3,922.49, expenses: \$573.43 filed by Tan Kok Quan Partnership (Filed: 6/28/2023) [ECF No. 23350]

2. The deadline for filing objections to the Fee Applications expired on July 28, 2023 at 4:00 p.m. A hearing on the Fee Applications has been scheduled for August 16, 2023 at 10:00 a.m.

3. Pursuant to the Order Establishing Notice Procedures (*Sec. Inv'r Prot. Corp. v. Bernard L. Madoff Inv. Sec. LLC*, No. 08-1789 (SMB), ECF No. 4560) (the "Notice Order"), notice of hearing on the Fee Applications was provided by U.S. Mail postage prepaid or email to: (i) all parties included in the Master Service List as defined in the Notice Order; (ii) all parties that filed a notice of appearance in this case; (iii) the SEC; (iv) the IRS; (v) the United States Attorney for the Southern District of New York; and (vi) SIPC.

4. Counsel has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, responsive pleading, or request for a hearing with respect to the Fee Applications appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Fee Applications.

5. An electronic copy of the proposed order (the "Order") that is substantially in the form of the proposed order that was annexed to the Fee Applications will be submitted to the Court, along with this certificate.

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing.

Dated: August 1, 2023
New York, New York

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